

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

CRIMINAL NO. 10-20454

Plaintiff,

HON. MARIANNE O. BATTANI

v.

**D-1 YU QIN,
aka YU CHIN,**

and

**D-2 SHANSHAN DU,
aka SHANNON DU,**

Defendants.

DISCOVERY NOTICE

The defendants, having made a request for discovery pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government states the following:

1. The attorney for the government knows that the defendants made
 - a. the following relevant written or recorded statements, (including grand jury testimony):

Yu Qin:

- 1) 8/30/05 Interview with Controlled Power Company representatives;
- 2) 2/1/06 Report of interview with GM representatives;
- 3) 4/24/26/06 Deposition (typed transcript and videotape);
- 4) 10/14/05 Affidavit.

Shanshan Du

- 1) 2/1/06 Report of interview with GM representatives;
- 2) 4/28/06 Deposition

- b. no relevant oral statements made in response to interrogation, whether before or after arrest, by a person then known to the defendant to be a government agent, whether or not the statement is included in a written record.
- 2. The attorney for the government knows that defendants have no prior criminal record.
- 3. The following books, papers, documents, photographs and tangible objects are within the possession, custody or control of the government and are intended to be used as evidence in chief at trial, are known to the government to be material to the preparation of the defense, or were obtained from or belong to the defendant:

GM documents and records

Email communications

Computer records

Corporate records

Employment records

Bank records

Credit card records

Shredded documents recovered from dumpster

Photographs

- 4. Results or reports of the following physical or mental examinations, or scientific tests or experiments, are within the possession, custody or control of the government, and are either intended to be used as evidence in chief at trial or are known to the government to be material to the preparation of the defense:

No such reports have been finalized to date.

- 5. The government intends to introduce at trial testimony from one or more experts in the following areas of expertise: At this time, the government has not yet determined whether it will call any expert witnesses at trial.

6. The government may introduce evidence obtained from execution of the following search warrant: 06-50485.
7. The government may introduce evidence obtained through wiretaps or other electronic surveillance: not applicable.
8. At this time, the government has not determined whether it will offer evidence at trial pursuant to Federal Rule of Evidence 404(b).

The attorney for the government is aware of the obligations imposed by Brady v. Maryland, 373 U.S. 83 (1963), and its progeny and will comply with its obligation to provide defense counsel with exculpatory evidence that is material to either guilt or to punishment in time for effective use at trial.

If the government discovers additional information of the type described in Paragraphs One through Eight, it will advise defense counsel in writing.

Upon specific request of the defendant the government will make available for inspection or copying the items described in Paragraphs One, Three, and Four; will provide a summary (which will include the witnesses' qualifications, opinions, and the bases and reasons for the opinions) of the anticipated testimony described in Paragraph Five if the government determines to call an expert witness at trial and will provide notice of the general nature of the evidence referred to in Paragraph Eight. Having received a defense request for discovery, the government requests each item described in Fed. R. Crim. P. 16(a)(1) (A)-(E).

CATHLEEN M. CORKEN
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Dated: August 9, 2010

CERTIFICATE OF SERVICE

I hereby certify that on August 9, 2010, I electronically filed the foregoing document with the Clerk of the Court using the ECF system which will send notification of such filing to all counsel of record.

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